

RENE L. VALLADARES
Federal Public Defender
State Bar No. 11479
RACHEL KORENBLAT
Assistant Federal Public Defender
411 E. Bonneville Avenue, Suite 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax

Attorneys for Derrick Anthony Woodfin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

2:14-CR-410-GMN-VCF

**UNOPPOSED MOTION FOR THE
PREPARATION OF PRE-PLEA
PRESENTENCE REPORT (PSR)**

AND ORDER

UNITED STATES OF AMERICA,
Plaintiff,
vs.
DERRICK ANTHONY WOODFIN
Defendant.

COMES NOW the defendant, Derrick Anthony Woodfin, by and through his counsel of record, Rachel Korenblat, Assistant Federal Public Defender, and files this Motion for the Preparation of Pre-Plea Presentence Report (PSR). This pleading is based upon the attached Memorandum of Points and Authorities and all of the papers and pleadings on file herein.

DATED this 28th day of January, 2015.

RENE L. VALLADARES
Federal Public Defender

By: /s/ Rachel Korenblat
RACHEL KORENBLAT
Assistant Federal Public Defender

POINTS AND AUTHORITIES

On December 31, 2014, Derrick Woodfin was charged in a Criminal Indictment with violation of 49 U.S.C. § 46504, Interference with Flight Crew. On January 6, 2015, Mr. Woodfin made his initial appearance and entered his plea of not guilty to the charge in the indictment.

The parties are in the process of attempting to negotiate this case. Based on the undersigned's review of Mr. Woodfin's criminal record there is a concern that he may qualify as a career offender, which would cause him to face a significant amount of custodial time. Undersigned counsel has communicated with Assistant United States Attorney, Alexandra Michael, and she does not oppose this request for a pre-plea presentence investigation.

To satisfy Mr. Woodfin's concerns and to assure that he has the information he needs to make a truly knowing and intelligent decision about how to proceed with his case, he has requested that a Pre-Plea Presentence Investigation Report be completed to determine if his prior convictions will trigger the sentencing enhancements pursuant to the career offender provisions in the Sentencing Guidelines.

CONCLUSION

Therefore, Mr. Woodfin respectfully request that this Honorable Court enter an Order directing that the United States Department of Probation prepare a Pre-Plea Presentence Investigation Report to determine Mr. Woodfin's criminal history.

DATED this 28th day of January, 2015.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

By: /s/ Rachel Korenblat
RACHEL KORENBLAT
Assistant Federal Public Defender

ORDER

IT IS HEREBY ORDERED that the United States Probation Office shall prepare and provide to the Court by **March 31, 2015**, a Pre-Plea Presentence Investigation Report calculating Derrick Anthony Woodfin's criminal history.

DATED this 30th day of January, 2015.

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 The undersigned hereby certifies that I am an employee of the Federal Public Defender for
3 the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

4 That on January 28, 2015, I served an electronic copy of the above and foregoing
5 **UNOPPOSED MOTION FOR THE PREPARATION OF PRE-PLEA PRESENTENCE**
6 **REPORT (PSR)** by electronic service (ECF) to the person named below:

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8 DANIEL G. BOGDEN
9 United States Attorney
10 ALEXANDRA M. MICHAEL
11 Assistant United States Attorney
12 333 Las Vegas Blvd. So., 5th Floor
13 Las Vegas, Nevada 89101

14 */s/ Karen Meyer*
15 Employee of the Federal Public Defender